

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL BUSINESS
MACHINES CORPORATION,

Plaintiff and Counterclaim-
Defendant,

v.

PLATFORM SOLUTIONS,
INCORPORATED,

Defendant and Counterclaim-
Plaintiff.

No. 06-cv-13565 (CLB)(MDF)

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Eastern and Southern Districts of New York, I, Elena K. Chan, a member
in good standing of the bar of this Court, hereby move for an Order allowing the
admission *pro hac vice* of:

David L. Patrón
PHELPS DUNBAR LLP
365 Canal Street, Suite 2000
New Orleans, Louisiana 70130
Telephone: (504) 584-9295
Facsimile: (504) 568-9130
Email: patrond@phelps.com

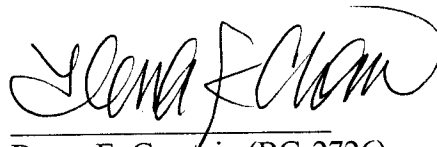
1. David L. Patrón is a member in good standing of the Bar of the State of Louisiana.

2. There are no pending disciplinary proceedings against David L. Patrón in any State or Federal court.

Dated: December 14, 2007

Respectfully submitted,

New York, NY

A handwritten signature in black ink, appearing to read 'Elena K. Chan', written over a horizontal line.

Bruce E. Gerstein (BG-2726)

Noah Silverman (NS-5728)

Elena K. Chan (EC-2337)

GARWIN GERSTEIN & FISHER LLP

1501 Broadway, Suite 1416

New York, New York 10036

Tel.: 212-398-0055

Fax: 212-764-6620

***Attorneys for Intervenor, T3 Technologies
Inc.***

United States of America

State of Louisiana

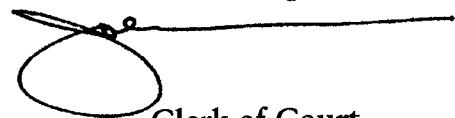
Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

DAVID LEE PATRON, ESQ., #22566

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 8th Day of October, 1993 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign
my name and affix the seal of this Court,
at the City of New Orleans, this the 14th
Day of November, 2007, A.D.

A handwritten signature in black ink, appearing to read "John Tarlton Olivier", is written over a horizontal line. Below the signature is a circular embossed seal.

Clerk of Court
Supreme Court of Louisiana

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	x	
INTERNATIONAL BUSINESS	:	
MACHINES CORPORATION,	:	No. 06-cv-13565 (CLB)(MDF)
	:	
Plaintiff and Counterclaim-	:	AFFIDAVIT OF ELENA K.
Defendant,	:	CHAN IN SUPPORT OF
	:	MOTION TO ADMIT COUNSEL
v.	:	<i>PRO HAC VICE</i>
	:	
PLATFORM SOLUTIONS,	:	
INCORPORATED,	:	
	:	
Defendant and Counterclaim-	:	
Plaintiff.	:	
	x	

[illegible]

Elena K. Chan, being duly sworn, hereby deposes and says as follows:

1. I am an associate at Garwin Gerstein & Fisher LLP, counsel for Intervenor, T3 Technologies, Inc., in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Intervenor's motion to admit David L. Patrón as counsel *pro hac vice* to represent Intervenor, T3 Technologies, Inc., in this matter.

2. I am a member in good standing of the New York and New Jersey state bars, and was admitted to practice law in these jurisdictions on July 27, 2005 and December 7, 2004, respectively. I am also admitted to the United State District Courts for the Southern and Eastern Districts of New York, and the District of New Jersey, and am in good standing with these Courts.

3. I have known David L. Patrón since 2007.

4. David L. Patrón is a partner at Phelps Dunbar LLP in New Orleans, Louisiana.

5. I have found David L. Patrón to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move this Court to admit David L. Patrón, *pro hac vice*.

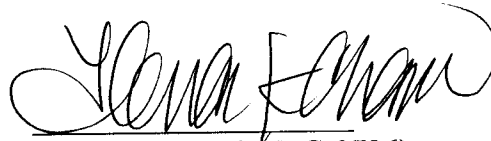
7. I respectfully submit a proposed order granting the admission of David L. Patrón, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit David L. Patrón, *pro hac vice*, to represent Intervenor, T3 Technologies, Inc. in the above-captioned matter, be granted.

Dated: December 14, 2007

New York, NY

Respectfully submitted,



Bruce E. Gerstein (BG-2726)

Noah Silverman (NS-5728)

Elena K. Chan (EC-2337)

GARWIN GERSTEIN & FISHER LLP

1501 Broadway, Suite 1416

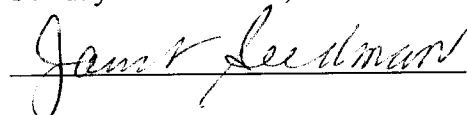
New York, New York 10036

Tel.: 212-398-0055

Fax: 212-764-6620

Attorneys for Intervenor, T3 Technologies Inc.

Sworn to before me this
14th day of December, 2007



JANET SEIDMAN
Notary Public State Of New York
No. 24-4705123
Qualified in Kings County
Commission Expires January 31, 2010